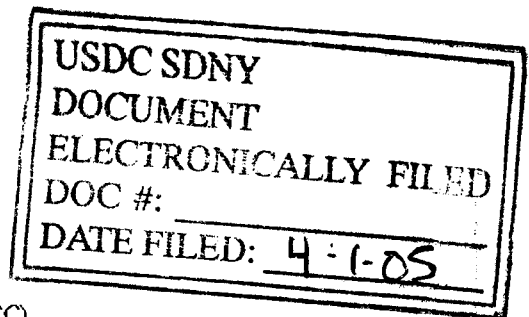


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re TERRORIST ATTACKS on
SEPTEMBER 11, 2001

03 MDL 1570 (RCC)
ECF Case



This document relates to:

Estate of John P. O'Neill, et al v. Al Baraka Inv. & Dev. Corp., et al, 04-CV-1923 (RCC)

**STIPULATION AND ORDER
FOR SERVICE OF PROCESS AND SETTING SCHEDULE FOR
DALLAH AL BARAKA GROUP, LLC TO RESPOND TO
THE SECOND AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for Plaintiffs and for Defendant, Dallah Al Baraka Group, LLC ("Al Baraka"), that undersigned counsel for Al Baraka will accept service of the Second Amended Complaint on behalf of Al Baraka in the case of *Estate of John P. O'Neill, et al v. Al Baraka Inv. & Dev. Corp., et al, 04-CV-1923 (RCC)(S.D.N.Y.)*, subject to the approval of the Court, according to the following terms:

1. A copy of the summons and Second Amended Complaint, in English, shall be served via Federal Express on counsel for Al Baraka at the following address:

**Martin F. Mc Mahon, Esquire
1150 Connecticut Ave., NW
Washington, DC 20035**

2. Al Baraka shall have sixty (60) days from the date of receipt of the Second Amended Complaint to move to dismiss or to answer the Second Amended Complaint.

3. Plaintiffs shall have sixty (60) days from the date on which it is served with Al Baraka's response to the Complaint, to serve its opposition to same or to respond to the answer.

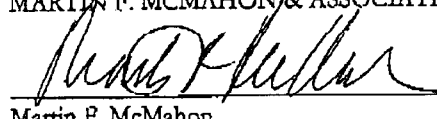
4. Al Baraka shall have thirty (30) days from the date on which Al Baraka is served with Plaintiffs' opposition to a motion to dismiss, or response to an answer, to reply to that opposition.

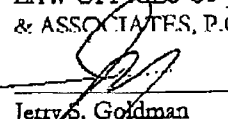
5. The foregoing schedule is without waiver of any of Al Baraka's defenses, except that Al Baraka does not challenge the sufficiency of process or the sufficiency of Plaintiffs' service of process on Al Baraka in this case if made in compliance with Paragraphs 1-4 above. Al Baraka hereby waives all affirmative defenses, objections and arguments relating to the sufficiency of process and the sufficiency of service of process during the course of this litigation.

Respectfully submitted,

MARTIN F. MCMAHON & ASSOCIATES

LAW OFFICES OF JERRY S. GOLDMAN
& ASSOCIATES, P.C.


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Dated: March __, 2005

Dated: March 7, 2005

*Counsel for Defendant
Al Baraka*

Counsel for Plaintiffs

Dated: New York, New York
April 1, 2005

SO ORDERED:


Richard C. Casey
U.S.D.J.